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Attorneys for **Plaintiff, City of Atlantic City**

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE

THE CITY OF ATLANTIC CITY, :

Civil No.: 1:14-CV-05169 (RBK/AMD)

Plaintiff(s), :

v. :

**NOTICE OF MOTION TO COMPEL
THE RE-DEPOSITION TESTIMONY OF
DEFENDANT W. WESLEY DRUMMON**

ZEMURRAY STREET CAPITAL, LLC, :
W. WESLEY DRUMMON, :

Defendant(s). :

TO DEFENDANT AND HIS COUNSEL OF RECORD:

Felix Gonzalez, Esq.

3403 Iron Rock Court

Pennsauken, NJ 08109

Attorney For Defendants, Zemurray Street Capital, LLC & W. Wesley Drummon

NOTICE IS HEREBY GIVEN that on September 21, 2015, at 9 a.m., or as soon thereafter as the matter can be heard before the Honorable Judge Ann Marie Donio in the United States District Court for the District of New Jersey, Camden Vicinage, Plaintiff will move before the Court to compel the re-deposition testimony of Defendant W. Wesley Drummon pursuant to Federal Rule of Civil Procedure 37(a), Local Rule 7.1, and this Court's Order dated May 29, 2015.

The motion will be made on the grounds that the Defendant W. Wesley Drummon may not make a blanket invocation of his Fifth Amendment privilege against self-incrimination prior to the answering of any questions. This motion will be based on this Notice of Motion and Motion, the Memorandum in Support thereof, Declaration of Christopher A. Khatami, Esq., as served and filed herewith, the records and file herein, and on such evidence as may be presented at the hearing of the motion.

DATED: August 24, 2015

/S/ Christopher A. Khatami

CHRISTOPHER A. KHATAMI, ESQ.
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